

EXHIBIT 15

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

* * * * *
MOSHE SAPERSTEIN, et al., Case No:

Plaintiffs 04-20225-CIV

vs.

THE PALESTINIAN AUTHORITY;
THE PALESTINE LIBERATION
ORGANIZATION,

Defendants

* * * * *

VIDEOCONFERENCED RULE 30(b)(6) DEPOSITION OF:
YASER MUHAMMED MUSSA SHAQBA'U
JERUSALEM, ISRAEL
MAY 25, 2010

Interpreted videoconferenced Rule 30(b)(6)
deposition of YASER MUHAMMED MUSSA SHAQBA'U, taken in
the above-entitled cause pending in the United States
District Court, Southern District, Southern District of
Florida, pursuant to notice, before BRENDA MATZOV, CA
CSR No. 9243, Commissioner, and ISABELLE KLEBANOW, RPR,
CT, No. 311, Stenographer, at the Hebrew University of
Jerusalem, Mt. Scopus, Jerusalem, Israel, on Tuesday,
the 25th day of May, 2010, at 10:28 a.m. Israel time.

REPORTED BY: ISABELLE KLEBANOW, RPR, CT NO. 311

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<p>1 Ministry of Finance.</p> <p>2 MR. TOLCHIN: Could you repeat that. Or</p> <p>3 just let me --</p> <p>4 (Counsel reads stenographer's screen.)</p> <p>5 MR. TOLCHIN: Okay.</p> <p>6 Q. Are you done with your answer, sir?</p> <p>7 A. I'm done answering.</p> <p>8 Q. Okay. You said that you worked in the capacity</p> <p>9 that you mentioned for four years, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Did you have a title? Was there a name of your</p> <p>12 job at that time?</p> <p>13 A. I was a beginner at work. I was an accountant,</p> <p>14 an accountant at the Palestinian National Fund, yes.</p> <p>15 Q. Okay. After those four years, did you move on to</p> <p>16 another job?</p> <p>17 A. Yes. I moved to the Administration of General</p> <p>18 Accounts.</p> <p>19 Q. And was that also with the Palestine National</p> <p>20 Fund?</p> <p>21 A. Yes. I'm talking about departments under the</p> <p>22 Palestinian National Fund.</p> <p>23 There was the embassies accounts. There was</p> <p>24 also the personnel account -- personnel administration;</p> <p>25 and payment accounts, payments administration; and</p>	<p>1 the person in charge of this section.</p> <p>2 Q. Okay.</p> <p>3 MR. TOLCHIN: Somebody seems --</p> <p>4 A. But I have been in actual charge since 1996 until</p> <p>5 now.</p> <p>6 Q. Okay.</p> <p>7 MR. TOLCHIN: Somebody seems to be fidgeting</p> <p>8 with a microphone.</p> <p>9 I can't see what's off camera in Amman, but</p> <p>10 is it possible that somebody has a paper or a book</p> <p>11 touching the microphone?</p> <p>12 THE WITNESS: The microphone is in front of</p> <p>13 me, and I'm not playing -- I'm not fidgeting with it.</p> <p>14 MR. TOLCHIN: Okay. Good to hear.</p> <p>15 THE WITNESS: Me too. Same here.</p> <p>16 Q. Sir, you used the word Palestine National</p> <p>17 Authority?</p> <p>18 A. Yes.</p> <p>19 Q. Is that the same as what's sometimes called the</p> <p>20 Palestinian Authority?</p> <p>21 A. No. Yes. Yes, it is the Palestine National</p> <p>22 Authority, yes.</p> <p>23 Q. The Palestine National Authority and the</p> <p>24 Palestine Authority are one and the same thing, correct?</p> <p>25 A. Yes.</p>
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<p>1 general accounts, which I just referred to; and the</p> <p>2 internal auditing section.</p> <p>3 Q. Now, when --</p> <p>4 A. These were the sections under the Palestinian</p> <p>5 National Fund.</p> <p>6 Q. Now, when you were in this second position, how</p> <p>7 long did you stay in that position?</p> <p>8 A. I am still in this position until now.</p> <p>9 Q. So that was from -- what year did you start?</p> <p>10 A. I started in 1993.</p> <p>11 Q. So, from 1993 until today, you've remained in</p> <p>12 this position?</p> <p>13 A. Yes, at the Administration of General Accounts.</p> <p>14 And I am now in charge of this administration.</p> <p>15 Q. And have your duties been the same since 1993?</p> <p>16 MR. HIBEY: Excuse me. Can you shift closer</p> <p>17 to the microphone? Now that you're hunched over that</p> <p>18 way, we can't hear you.</p> <p>19 Q. And have your duties been the same since 1993?</p> <p>20 A. Of course not. I became the first man in charge</p> <p>21 of this section, as of 1996.</p> <p>22 Q. Okay. So, since 1996, have your duties remained</p> <p>23 the same?</p> <p>24 A. Yes. Since 1996, my duties have been the same.</p> <p>25 However, I was given this professional title in 2001, as</p>	<p>1 Q. Okay.</p> <p>2 A. Yes. That's correct.</p> <p>3 Q. And the Palestine National Fund is something</p> <p>4 else, which is where you work, correct?</p> <p>5 A. Yes. Yes.</p> <p>6 Q. Yes. Okay. Now, you also mentioned something</p> <p>7 called the PLO, correct?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Now, what is the PLO?</p> <p>10 A. The Palestinian Liberation Organization is, as is</p> <p>11 well known, the representative of the Palestinian</p> <p>12 people, and it is the top political entity which</p> <p>13 represents it.</p> <p>14 And it consists of an executive entity which</p> <p>15 comprises different departments or different sections,</p> <p>16 like any ministries in any government.</p> <p>17 And the Palestinian National Fund is one of</p> <p>18 such departments, similar to the Ministry of Finance in</p> <p>19 any country. Yes.</p> <p>20 Q. Okay. I'm not sure I understood.</p> <p>21 Are you saying the Palestine National Fund is the</p> <p>22 functional equivalent of the Ministry of Finance?</p> <p>23 Is that what you said?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. What is the Palestine National Fund the</p>

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<p>1 Ministry of Finance of?</p> <p>2 A. The PLO.</p> <p>3 Q. The PLO. Okay.</p> <p>4 Now, you testified, if I'm not mistaken,</p> <p>5 that, before the Oslo accords, the function of the PNF</p> <p>6 was different than after the Oslo accords, is that</p> <p>7 correct?</p> <p>8 A. No. That -- it's not different. I was only</p> <p>9 talking about revenues, about the matter of revenues was</p> <p>10 different.</p> <p>11 The sources of revenues have changed, but</p> <p>12 the laws that organize or that govern them have not</p> <p>13 changed.</p> <p>14 Q. Okay. Before Oslo, what was the source of</p> <p>15 revenue of the PNF?</p> <p>16 MR. HILL: Objection. This is beyond the</p> <p>17 scope for which the witness has been ordered to appear.</p> <p>18 The order requires the witness to testify</p> <p>19 about funds received by the PNF for the period between</p> <p>20 October 1, 2000 and February 18, 2002.</p> <p>21 MR. TOLCHIN: Okay.</p> <p>22 Q. You can answer the question.</p> <p>23 THE INTERPRETER: The question was never</p> <p>24 interpreted because I waited for the objection. So what</p> <p>25 was the question again?</p>	<p>1 THE INTERPRETER: No.</p> <p>2 A. I am not aware -- I'm not totally familiar with</p> <p>3 those sources.</p> <p>4 But my expectation is it is still donations</p> <p>5 from European countries, in addition to taxes collected</p> <p>6 from the territories under the Palestine National</p> <p>7 Authority.</p> <p>8 Q. Okay. I have to clarify.</p> <p>9 Do you know, sir, in the period after Oslo, where</p> <p>10 the PNF revenue comes from?</p> <p>11 MR. HILL: Wait. Let me make an objection</p> <p>12 for the record.</p> <p>13 A. I said I don't know. I said I'm not sure.</p> <p>14 Q. You don't know?</p> <p>15 MR. HILL: Hold on. Stop. Stop.</p> <p>16 The witness has got to hear the objection,</p> <p>17 as well as the question, before the witness responds.</p> <p>18 Okay. So, for the record, I want to object</p> <p>19 to the last question that is beyond the scope for which</p> <p>20 the witness is appearing today to the extent it exceeds</p> <p>21 the time period in the order.</p> <p>22 MR. TOLCHIN: Now, I want to say something,</p> <p>23 Brian. I hear your objection.</p> <p>24 And it's my position that asking about the</p> <p>25 period after Oslo, which encompasses the period of the</p>
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<p>1 MR. TOLCHIN: I just ask -- no problem with</p> <p>2 making objections, Brian, but let the interpreter</p> <p>3 interpret, and then make your objection and let him</p> <p>4 interpret that.</p> <p>5 THE INTERPRETER: What was the question?</p> <p>6 Q. Before Oslo, what was the source of revenue of</p> <p>7 the PNF?</p> <p>8 MR. HILL: Same objection.</p> <p>9 Q. And you can answer.</p> <p>10 A. Mostly donations from countries and from the --</p> <p>11 from Palestinian people who work in certain countries,</p> <p>12 like in Kuwait and other Persian Gulf countries, Libya</p> <p>13 and so forth.</p> <p>14 Q. Okay.</p> <p>15 A. But there were also donations from states, from</p> <p>16 governments.</p> <p>17 Q. Okay. And, after Oslo, what was the source, or</p> <p>18 what became the source, of PNF revenue?</p> <p>19 MR. HILL: I have the same objection to the</p> <p>20 extent this pertains to the period before the Court's</p> <p>21 order, which commences on October 1, 2000 and ends on</p> <p>22 February 18, 2002.</p> <p>23 MR. TOLCHIN: Understood.</p> <p>24 Q. You can answer the question.</p> <p>25 MR. HILL: Did you translate the objection?</p>	<p>1 order and lays the foundation and background for getting</p> <p>2 to the time period in the order so we can understand the</p> <p>3 history and the progression, is a perfectly proper</p> <p>4 question.</p> <p>5 But we don't have to resolve it today,</p> <p>6 fortunately. And I'm prepared to agree with you that</p> <p>7 you have this objection preserved, without having to go</p> <p>8 through the lengthy and cumbersome process of objecting</p> <p>9 and the translations of the objections to the remote</p> <p>10 witness, which invariably result in the witness not</p> <p>11 remembering the question, and the question having to be</p> <p>12 asked again and your objection being made again.</p> <p>13 And we'll all grow old here on Mt. Scopus.</p> <p>14 MR. HILL: Bob, I appreciate that offer.</p> <p>15 The problem is, it makes a difference, in</p> <p>16 terms of the ultimate admissibility of the answer,</p> <p>17 whether a question is within the scope of the order.</p> <p>18 And, therefore, I will assert the objection</p> <p>19 to every question that you pose that is beyond the scope</p> <p>20 of the order.</p> <p>21 If you want to simplify the process, I would</p> <p>22 suggest that you ask questions within the scope of the</p> <p>23 order. That is your decision, and I will make proper</p> <p>24 objections.</p> <p>25 Q. Sir, do you --</p>

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<p>1 All right. We appear to have lost --</p> <p>2 MR. TOLCHIN: Charles, are you there?</p> <p>3 MR. HILL: We appear to have lost</p> <p>4 Mr. McAleer. I would suggest we take a recess and get</p> <p>5 the technical people in here and see if we can</p> <p>6 re-establish a connection.</p> <p>7 Let's go off the record.</p> <p>8 MR. HIBEY: Right now we only have you guys</p> <p>9 on the screen.</p> <p>10 MR. HILL: Right. We've lost the third</p> <p>11 connection, so I'm going to ask for a recess.</p> <p>12 Let's go off the record and get the</p> <p>13 technical people in here and see if we can re-establish</p> <p>14 the connection with Washington.</p> <p>15 We're off the record.</p> <p>16 (Short recess taken from 11:13 until 11:24.)</p> <p>17 Q. Sir, earlier, when I asked you to tell me what</p> <p>18 the PNA is, you gave me a summary of how the -- I'm</p> <p>19 sorry. The PNA. I meant the PNF.</p> <p>20 Let me withdraw the question and start</p> <p>21 again.</p> <p>22 Earlier, I asked you to give me a summary of</p> <p>23 what the PNF is, and your summary began in 1964. And</p> <p>24 then you told me there were some changes after the</p> <p>25 implementation of the Oslo accords that brought us up to</p>	<p>1 MR. TOLCHIN: We agreed that you're going to</p> <p>2 let him translate the question and then you're going to</p> <p>3 make your objection.</p> <p>4 And, once again, you've cut off the</p> <p>5 question, just as we discussed. And you said you</p> <p>6 weren't going to do that anymore.</p> <p>7 A. I can tell you that, during that period, no</p> <p>8 revenues came to the Fund except from the Palestinian</p> <p>9 National Authority only.</p> <p>10 THE INTERPRETER: And the interpreter wishes</p> <p>11 to say again that the question was never interpreted.</p> <p>12 Q. Okay. Did you understand my last question, sir?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Thank you.</p> <p>15 Now, you testified, if I'm not mistaken,</p> <p>16 that the purpose of the PNF is to finance PLO</p> <p>17 institutions.</p> <p>18 Is that what you said?</p> <p>19 A. The institutions of the PLO.</p> <p>20 Q. Okay. Now, what institutions of the PLO are</p> <p>21 financed by the PNF?</p> <p>22 And, once again, it's not a trick question.</p> <p>23 If your answer is different at different times in</p> <p>24 history, you can tell me that. If it's been always the</p> <p>25 same, you can tell me that also.</p>
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<p>1 until today.</p> <p>2 Do you recall that testimony?</p> <p>3 A. The changes -- as far as changes to the laws</p> <p>4 pertinent to the Fund, none occurred. The revenues only</p> <p>5 changed.</p> <p>6 Q. Okay. And when did the revenues change?</p> <p>7 A. After the establishment of the National</p> <p>8 Authority, the revenues of the Fund have become from</p> <p>9 the National Authority only.</p> <p>10 Q. From the PA?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And is it fair to say that the change you</p> <p>13 just described took place approximately 1993 or 1994?</p> <p>14 A. 1994.</p> <p>15 Q. 1994. And, from 1994 until today, including the</p> <p>16 time between 2000 and 2002, the revenues of the</p> <p>17 Palestine National Fund come from the Palestinian</p> <p>18 Authority, is that correct?</p> <p>19 MR. HILL: Objection to the extent that the</p> <p>20 question exceeds the date range in the Court's order.</p> <p>21 THE INTERPRETER: The question was not</p> <p>22 interpreted.</p> <p>23 MR. TOLCHIN: Brian, you've got to stop</p> <p>24 doing that.</p> <p>25 MR. HILL: Bob, ask a proper question.</p>	<p>1 MR. HILL: Objection to the extent the</p> <p>2 question exceeds the period required by the Court's</p> <p>3 order.</p> <p>4 Q. But you can answer the question.</p> <p>5 A. Can I answer?</p> <p>6 Q. Please.</p> <p>7 A. Some departments under the PLO became ministries</p> <p>8 after the Oslo accords. However, some of them remained.</p> <p>9 What's important here is that the embassies</p> <p>10 of the PLO remained under the PLO, and these do not</p> <p>11 represent the Palestinian National Authority abroad.</p> <p>12 And that's why -- and that's why the Fund</p> <p>13 remained in that form, because the embassies remained,</p> <p>14 along with some other -- some other departments, all</p> <p>15 remained under the PLO.</p> <p>16 Q. Other than the embassies, what other departments</p> <p>17 remained under the PLO after Oslo?</p> <p>18 MR. HILL: Objection to the extent the</p> <p>19 question exceeds the period required by the Court's</p> <p>20 order.</p> <p>21 Q. You could answer.</p> <p>22 A. The Political Department remains, and the</p> <p>23 Refugees -- the Palestinian Refugees Affairs Department</p> <p>24 also remains. And there are other institutions, such as</p> <p>25 Health -- Palestinian Health Insurance Department.</p>

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<p>1 THE INTERPRETER: Okay. I will repeat the</p> <p>2 translation if the witness repeats the answer.</p> <p>3 MR. TOLCHIN: Why don't we have the court</p> <p>4 reporter read back the translation that was given.</p> <p>5 MR. HILL: She can't read the translation.</p> <p>6 Do you want her to read the pending question?</p> <p>7 MR. TOLCHIN: Read the pending question.</p> <p>8 MR. HILL: In English. Then the translator</p> <p>9 can re-translate.</p> <p>10 MR. TOLCHIN: That's fine.</p> <p>11 (Record read back by Reporter.)</p> <p>12 A. No. When I issue any financial report, I do not</p> <p>13 receive any instructions except from Mr. Khouri and</p> <p>14 Mr. Nashashibi only.</p> <p>15 Q. Okay. But did anyone give you an instruction, in</p> <p>16 connection with your work on the Saperstein case, with</p> <p>17 regard to any limitation on what expenses you were</p> <p>18 supposed to be reviewing?</p> <p>19 MR. HILL: Objection. Vague.</p> <p>20 A. No.</p> <p>21 Q. No. Okay.</p> <p>22 What exactly did Mr. Khouri tell you you</p> <p>23 were supposed to be looking for?</p> <p>24 A. He asked me to look for financial transfers for a</p> <p>25 period -- for a certain period -- to the Fatah movement</p>	<p>1 right now?</p> <p>2 A. No. Not in this building. I am not at the Fund</p> <p>3 headquarters now.</p> <p>4 Q. Oh, okay.</p> <p>5 Other than that request that was made by</p> <p>6 Mr. Khouri in September of 2009, did you do anything</p> <p>7 else in connection with this case until you met with</p> <p>8 Mr. McAleer ten days ago?</p> <p>9 A. Of course. I looked -- I looked at records as of</p> <p>10 September of 2009. I looked at financial records as of</p> <p>11 September of 2009.</p> <p>12 Q. That was in your computer?</p> <p>13 A. Yes.</p> <p>14 Q. Did you make any print-outs from your computer?</p> <p>15 A. Usually, when I need to print out any report from</p> <p>16 the computer, I print it out. And when I need any</p> <p>17 document from the archives, I request it.</p> <p>18 Q. Sir, between October 1, 2000 and February 18,</p> <p>19 2002 -- and I'm going to ask you a bunch of questions</p> <p>20 relating to that date range, so I'll say it again.</p> <p>21 October 1, 2000, February 18, 2002.</p> <p>22 MR. HILL: Bob, before we get into this</p> <p>23 area, I'm wondering if the court reporter and the</p> <p>24 translator would like a break.</p> <p>25 We've been on the record for a significant</p>
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<p>1 and to the other 24 or 25 persons -- 24 or 25 persons.</p> <p>2 Q. And did he give you the names of the 24 or</p> <p>3 25 persons verbally, or was that on a written paper?</p> <p>4 A. It was on a piece of paper. They were on a piece</p> <p>5 of paper.</p> <p>6 Q. And what was the paper?</p> <p>7 THE INTERPRETER: What was the paper?</p> <p>8 MR. TOLCHIN: Yes.</p> <p>9 Q. What sort of paper was it?</p> <p>10 A. What type of paper? A printed paper. A printed</p> <p>11 paper.</p> <p>12 Q. Was it --</p> <p>13 A. It was in English. A computer print-out.</p> <p>14 Q. In English?</p> <p>15 A. In English and in Arabic.</p> <p>16 Q. There was a paper in English and in Arabic that</p> <p>17 told you what you were supposed to be looking for?</p> <p>18 A. In Arabic there wasn't. In English.</p> <p>19 And it might be that one of my colleagues in</p> <p>20 the Fund wrote the names in Arabic. I do not remember.</p> <p>21 Q. Do you still have this paper?</p> <p>22 A. Certainly.</p> <p>23 Q. And where is it?</p> <p>24 A. In my office.</p> <p>25 Q. Okay. Is that in the same building where you are</p>	<p>1 period of time. Can we take a break and let the</p> <p>2 hard-working folks have some time off the record?</p> <p>3 MR. TOLCHIN: Let's just have one ground</p> <p>4 rule.</p> <p>5 If anyone wants a break, say it. But</p> <p>6 there's too many people involved here for people to be</p> <p>7 altruistically asking for breaks for other people.</p> <p>8 Okay. Does somebody need a break?</p> <p>9 THE INTERPRETER: I don't mind a five-minute</p> <p>10 break.</p> <p>11 MR. TOLCHIN: Okay. A five-minute break.</p> <p>12 MR. HILL: Off the record.</p> <p>13 (Short recess taken from 12:51 until 1:07.)</p> <p>14 (Mr. Steiner and Mr. Leitner are absent.)</p> <p>15 Q. I was just telling you that, before the break,</p> <p>16 that we're going to talk about a certain time period</p> <p>17 from October 1, 2000 to February 18, 2002.</p> <p>18 During that time period -- October 1, 2000 to</p> <p>19 February 18, 2002 -- is it correct that the only sources</p> <p>20 of funds that the PNF received came from the PA?</p> <p>21 A. Yes.</p> <p>22 THE INTERPRETER: The question was not</p> <p>23 interpreted.</p> <p>24 Q. And during that time period -- October 1, 2000</p> <p>25 and February 18, 2002 -- how much money did the PNF</p>

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<p>1 receive from the PA?</p> <p>2 A. This is the data that I reviewed.</p> <p>3 In 2000, we received about 18 million</p> <p>4 US dollars, 18, yes. In the year 2001, we received</p> <p>5 about \$13 million.</p> <p>6 THE INTERPRETER: That was said in English</p> <p>7 by the witness.</p> <p>8 A. In the year 2002, approximately the same amount,</p> <p>9 \$13 million.</p> <p>10 But these were divided into two parts, a</p> <p>11 part that was received by the Fund's accounts in Amman,</p> <p>12 and the other was transferred directly from the Ministry</p> <p>13 of Finance to embassies.</p> <p>14 However, the Fund was responsible for -- the</p> <p>15 Fund was responsible for the total sum of those</p> <p>16 revenues.</p> <p>17 Q. Okay. During the same time period, October 1,</p> <p>18 2000 to 2002, what is the total amount of money that the</p> <p>19 PNF paid out or distributed to anyone?</p> <p>20 MR. HILL: And, Bob, for point of</p> <p>21 clarification, you said through 2002. Do you mean</p> <p>22 through February 18, 2002?</p> <p>23 MR. TOLCHIN: Yes.</p> <p>24 (Mr. Leitner re-enters.)</p> <p>25 A. Those three fiscal years, the financial data for</p>	<p>1 THE INTERPRETER: I'm sorry. I'm going to</p> <p>2 ask you to repeat the question.</p> <p>3 MR. TOLCHIN: Okay.</p> <p>4 Q. Earlier I asked you about monies received by the</p> <p>5 PNF, and you gave me figures of several millions of</p> <p>6 dollars for each of three different years.</p> <p>7 Now, in my next question, I asked you about</p> <p>8 monies paid out by the PNF. And I'm not sure that you</p> <p>9 understood that the question changed, based on your</p> <p>10 answer. So I want to clarify.</p> <p>11 A. Yes. And I answered accordingly.</p> <p>12 At that time, the Fund paid out all the</p> <p>13 money because, at that time, the Fund did not reserve</p> <p>14 any money, did not keep any money.</p> <p>15 Q. Other than the money that the Fund -- that the</p> <p>16 PNF receives each year in current receivables, does the</p> <p>17 Fund have any money in the bank? Any savings?</p> <p>18 Reserves?</p> <p>19 MR. HILL: Objection to the extent it</p> <p>20 exceeds the time period.</p> <p>21 THE INTERPRETER: The answer was no.</p> <p>22 Q. So is it your testimony, sir, that the PNF, in</p> <p>23 each of the years 2000, 2001 and 2002, spent everything</p> <p>24 that it received and had no other funds at all?</p> <p>25 A. Yes. Let me explain how we received money from</p>
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<p>1 those three fiscal years cover that period.</p> <p>2 Q. But I'm asking you now about the money that was</p> <p>3 paid out by the PNF.</p> <p>4 A. Most of that money was paid as salaries, and the</p> <p>5 rest was paid as expenditures to operate embassies.</p> <p>6 These were expenses similar to travel</p> <p>7 expenses, rent, and compensation for travel.</p> <p>8 Q. I think there's a --</p> <p>9 THE INTERPRETER: I missed what he said</p> <p>10 because --</p> <p>11 Q. I think I need to clarify the question.</p> <p>12 MR. HILL: The witness wasn't finished.</p> <p>13 A. -- and the stationery and other similar</p> <p>14 incidentals relevant to office work.</p> <p>15 Q. All right.</p> <p>16 THE INTERPRETER: That was in English.</p> <p>17 MR. HIBEY: He said, in English, the</p> <p>18 salaries is the most thing.</p> <p>19 Perhaps you should speak in Arabic.</p> <p>20 THE WITNESS: Sorry.</p> <p>21 A. The salaries accounted for the majority of those</p> <p>22 expenses. Maybe seventy percent or even more.</p> <p>23 Q. Okay. Sir, earlier I asked you about the funds</p> <p>24 received by the PNF, and you told me several millions of</p> <p>25 dollars for each of three years in question.</p>	<p>1 the Ministry of Finance.</p> <p>2 At the end of every month, we would make a</p> <p>3 request to cover the expenses that we anticipate, and</p> <p>4 that request is sent to the head of the PLO, who also is</p> <p>5 the head of the Palestinian National Authority.</p> <p>6 And then he would issue orders to get</p> <p>7 that -- to get those needs paid for by the Ministry of</p> <p>8 Finance. And then the transfer occurs to the National</p> <p>9 Fund.</p> <p>10 And this request is specified -- is</p> <p>11 specified in items. The request includes certain items.</p> <p>12 The request for finance includes specific items for</p> <p>13 spending, such as salaries, rents, and other similar</p> <p>14 items.</p> <p>15 Q. You're done?</p> <p>16 A. Thank you.</p> <p>17 THE INTERPRETER: Thank you.</p> <p>18 Q. Does the PNF have any long-term assets?</p> <p>19 MR. HILL: Objection. Beyond the scope for</p> <p>20 which he's ordered to appear.</p> <p>21 Q. And I'm referring to --</p> <p>22 THE INTERPRETER: The answer was no.</p> <p>23 Q. And I'm referring to the period --</p> <p>24 THE INTERPRETER: The answer was yes. I'm</p> <p>25 sorry. The answer was yes.</p>

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<p>1 Q. Do you consider your employment with the PLO to 2 be co-extensive with your employment with the PNF? 3 A. The Palestinian National Fund is a department of 4 the PLO. 5 Q. So, by virtue of being employed with one, you're 6 employed with the other? 7 A. The Palestinian National Fund is part of the PLO. 8 Q. Other than the funds administered by the 9 Palestine National Fund, does the PLO have any other 10 budget, to your knowledge? 11 MR. HILL: Objection. Beyond the scope for 12 which he's been ordered to appear. 13 Q. You can answer. 14 A. The administration of the monies pertinent to the 15 PLO is exclusively the function of the Palestinian 16 National Fund. 17 Q. Okay. So, other than the monies that the PNF 18 gives to the PLO, are you saying the PLO has no other 19 budget? 20 And I'm talking -- and I'm talking about the 21 time period of October 1, 2000 to February 2002. 22 MR. HILL: Same objection, plus vague and 23 confusing. 24 Q. But you can answer. 25 A. Always pertinent to the PLO are in the records of</p>	<p>1 which he's been ordered to appear. 2 A. Which were transferred to us from the Ministry of 3 Finance. 4 Q. Okay. That -- 5 A. Other than that, they did not have any revenues 6 except for the monies transferred by the Ministry of 7 Finance. 8 Q. Okay. 9 MR. TOLCHIN: Let's just take two minutes 10 off the record. We just received a fax. 11 (Short recess taken from 2:05 until 2:08.) 12 MR. TOLCHIN: Okay. Let's go back on the 13 record. 14 MR. HILL: Dick, we're ready to go back on 15 the record. Can you hear us? 16 MR. HIBEY: Thank you. 17 MR. HILL: We're going back on the record. 18 Q. Sir, is it accurate to describe the PNF as the 19 Treasury of the PLO? 20 A. It handles the monies pertinent to the PLO. 21 Q. But is it the Treasury of the PLO? 22 A. Yes. I agree. 23 Q. You agree? 24 A. Yes. 25 Q. Okay. And is it correct that, in the period of</p>
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<p>1 the Palestinian National Fund, certainly. 2 Q. I'm sorry. Maybe it's how it came out in the 3 translation, but the question -- your answer made no 4 sense, at least to me. 5 MR. HILL: Can we get a translation? 6 THE INTERPRETER: I didn't hear what he 7 said. 8 A. You asked me about the National Authority, not 9 the PLO, correct? 10 Q. No. I'm asking -- I'm asking -- you told us that 11 the PNF transfers money to the PLO for certain expenses. 12 What I'm asking you is, other than the 13 expenses that the PNF funds, does the PLO have any other 14 budgets from other sources. 15 MR. HILL: Objection. Beyond the scope for 16 which he's been ordered to appear, and asked and 17 answered. 18 A. When you say budget, what do you mean? Do you 19 mean revenues? Financial revenues? 20 Q. Okay. To your knowledge, other than the -- okay. 21 I'm going to ask the question carefully. 22 During the period of October 1, 2000 to February 23 2002, did the PLO have any sources of revenue other than 24 the monies transferred by the PNF? 25 MR. HILL: Objection. Beyond the scope for</p>	<p>1 2000 -- October 2000 to February 2002, all monies 2 received and spent by the PLO came through the PNF? 3 A. Yes. 4 Q. Okay. Now, did the PLO -- during the period of 5 2000 to 2002 that we've been discussing, did the PLO 6 provide funding to Fatah? 7 MR. HIBEY: That's been asked and answered. 8 MR. TOLCHIN: No, it hasn't. It's been 9 asked about the PNF. Now we're talking about the PLO. 10 MR. HILL: Objection. Beyond the scope for 11 which he's been ordered to appear, and it has been 12 answered. 13 THE INTERPRETER: The answer was, Not at 14 all. 15 Q. Not at all? 16 THE INTERPRETER: Not at all? 17 A. Not at all. 18 Q. Okay. Do you know whether the lawyers 19 representing the PLO in this case told the Court in this 20 case that Fatah is one of the political entities within 21 the PLO and, as such, it ought to be funded by the PLO, 22 and it is? 23 A. If that was said, that was not by someone 24 specialized like myself. 25 Q. So you think whoever said that didn't know what</p>